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June 26, 2000

The Honorable Rosalyn G. Millman
Deputy Administrator
National Highway Traffic Safety Administration
400 Seventh Street, S.W.
Washington, DC 20590

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Subject: Docket No. NHTSA 00-7013; Notice 1. 49 CFR Parts 552, 571, 585 and 595 - Federal Motor Vehicle Safety Standards; Occupant Crash Protection Final Rule; Interim Final Rule (65 FR 30680; May 12, 2000) Petition for Reconsideration

Dear Ms. Millman:

The Association of International Automobile Manufacturers, Inc. (AIAM) submits this petition for reconsideration of the referenced final rule/interim rule on advanced air bags. AIAM members generally support the requirements in the new rule that will allow automakers to make further improvements in air bag performance to better protect drivers and passengers of all sizes. However, we are concerned that the wording in paragraph S4.11, Test duration for purpose of measuring injury criteria, may not reflect the agency's intent for this requirement.

The final rule adopts specific points for the end of the period for measuring injury criteria in both crash tests and low-risk deployment tests which are described as follows:

"S4.11 Test duration for purpose of measuring injury criteria.

(a) For all barrier crash tests, the injury criteria shall be met when calculated based on data recorded for 300 milliseconds after the vehicle strikes the barrier. For low risk deployment tests, the injury criteria shall be met when calculated based on data recorded for 300 milliseconds after the air bag is signaled to deploy.

(b) The requirements for dummy containment shall continue until both the vehicle and the dummies have ceased moving." (65 FR 30748)

In explaining the rationale for this requirement, the agency states that:





"Traditionally, we have not counted data that is recorded as the result of the dummy's head neck or torso striking the vehicle interior when the dummy is no longer engaged in the air bag. We continue to believe, as apparently do commentators, that the air bag is neither responsible for these injury values nor could the air bag have prevented these interactions with the vehicle compartment. However, we are concerned that truncating the data to the point at which the occupant is no longer engaged in the air bag is insufficiently objective for compliance purposes. While we intend to retain our existing policy on considering the location of the dummy relative to the vehicle interior and the air bag at the time peak injury measurements are recorded, we have decided to keep the time parameters for measuring data at a specific level. Accordingly, data will be collected until 300 ms after the vehicle strikes the barrier in a dynamic crash." (65 FR 30728)

AIAM believes that the wording in S4.11 does not reflect the agency's intent to consider the location of the dummy relative to the vehicle interior and the air bag at the time peak injury measurements are recorded in order to avoid counting data from the dummy's head, neck, or torso striking the vehicle interior when the dummy is no longer engaged in the air bag. To ensure that the standard is consistent with the agency's intended policy, AIAM recommends the following be added at the end of paragraph S4.11(a):

"Injury measurements recorded as a result of dummy contact with the vehicle interior when the dummy's head, neck, and upper torso are no longer engaged in the air bag will not be considered in determining peak injury values."

If you or your staff have any questions regarding this submission, please call Michael Cammisa at 703.525.7788 ext. 233.

Sincerely,

Michael X. Cammisa
Director, Safety
Technical Affairs

cc: Clarke Harper, NPS-11
Ed Glancy, NCC-20
Rebecca MacPherson, NCC-20
Docket